

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

06 Civ. 0694 PKC)

NIPPON EXPRESS U.S.A.
(ILLINOIS), INC.,

Plaintiff,

- against -

M/V CHIANG JIANG BRIDGE et
ano.,

Defendants.

DEFENDANT, YANGMING MARINE
TRANSPORT CORP.'S NOTICE OF MOTION
TO DISMISS THE CLAIMS AGAINST IT ON
GROUND OF A MANDATORY AND
EXCLUSIVE FOREIGN FORUM SELECTION
CLAUSE

Please take notice that defendant, YANGMING MARINE TRANSPORT CORP., will move this Court before the P. Kevin Castel in Courtroom 12-C at the U.S. Courthouse at 500 Pearl Street, New York, NY for an order dismissing the claims against it on grounds of a mandatory and exclusive foreign forum selection agreement.

Please take further notice that your answering papers and opposing memoranda must be served and filed within the time provided for in Local Civil Rule 6.1(b).

Dated: New York, NY
May 18, 2007

CICHANOWICZ CALLAN KEANE VENGROW
& TEXTOR, LLP, 61 Broadway, Ste. 3000
New York, NY 10006 – Tel. 212-344-7042

By: /s/ Paul M. Keane
Paul M. Keane [PK-5934]
Attorneys for Defendant
YANGMING MARINE TRANSPORT CORP.

TO: Opposing Counsel